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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BLOCK, J.

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

GO, M.J.

-----X

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

MUNTHER OMAR SALEH,
also known as
"Abu Omar al-Ramli" and
"Abu Omar ar-Ramli," and
FAREED MUMUNI,

Cr. No. _____
(T. 18, U.S.C., §§ 111(a)(1), 111(b), 371,
981(a)(1)(C), 981(a)(1)(G), 1114(3),
2339B(a)(1), 2 and 3551 et seq.; T. 21,
U.S.C. § 853(p); T. 28 U.S.C. § 2461(c))

Defendants.

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THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy To Provide Material Support to a Foreign Terrorist Organization)

1. In or about and between February 2015 and June 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MUNTHER OMAR SALEH, also known as "Abu Omar al-Ramli" and "Abu Omar ar-Ramli," and FAREED MUMUNI, together with others, did knowingly and intentionally conspire to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including services and personnel, including themselves to a foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant.

(Title 18, United States Code, Sections 2339B(a)(1) and 3551 et seq.)

COUNT TWO

(Attempt To Provide Material Support to a Foreign Terrorist Organization)

2. In or about and between February 2015 and June 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MUNTHER OMAR SALEH, also known as “Abu Omar al-Ramli” and “Abu Omar ar-Ramli,” and FAREED MUMUNI, together with others, did knowingly and intentionally attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including services and personnel, including themselves, to a foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant.

(Title 18, United States Code, Sections 2339B(a)(1), 2 and 3551 et seq.)

COUNT THREE

(Conspiracy to Assault Federal Officers)

3. In or about and between May 2015 and June 2015, both dates being approximate and inclusive, within the Eastern District of New York, the defendants MUNTHER OMAR SALEH, also known as “Abu Omar al-Ramli” and “Abu Omar ar-Ramli,” and FAREED MUMUNI, together with others, did knowingly and intentionally conspire to forcibly assault, resist, oppose, impede, intimidate and interfere with one or more persons designated in Section 1114 of Title 18 of the United States Code, to wit: Special Agents and Task Force Officers of the Federal Bureau of Investigation, while such persons were engaged in, and on account of, the performance of official duties, and to do so with the use of a dangerous and deadly weapon, contrary to Title 18, United States Code, Sections 111(a)(1) and (b).

4. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants MUNTHER OMAR SALEH, also known as “Abu Omar al-Ramli” and “Abu Omar ar-Ramli,” and FAREED MUMUNI, together with others, did commit and cause to be committed, among others, the following:

OVERT ACTS

- a. On or about June 2, 2015, SALEH and MUMUNI exchanged electronic communications in which they discussed attacking members of law enforcement.
- b. On or about June 13, 2015, SALEH attempted to attack a law enforcement officer by charging at a law enforcement officer with a knife in his hand.
- c. On or about June 17, 2015, MUMUNI attempted to attack a law enforcement officer by charging at a law enforcement officer with a knife in his hand and stabbing him repeatedly.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT FOUR
(Assault of a Federal Officer)

5. On or about June 13, 2015, within the Eastern District of New York, the defendant MUNTHER OMAR SALEH, also known as “Abu Omar al-Ramli” and “Abu Omar ar-Ramli,” together with others, did knowingly and intentionally forcibly assault, resist, oppose, impede, intimidate and interfere with a person designated in Section 1114 of Title 18 of the United States Code with the intent to commit a subsequent felony, to wit: a Task Force Officer of the Federal Bureau of Investigation, while such person was engaged in and on

account of the performance of official duties, and such act involved the intent to commit another felony and the use of a dangerous and deadly weapon.

(Title 18, United States Code, Sections 111(a)(1), 111(b), 2 and 3551 et seq.)

COUNT FIVE
(Attempted Murder of Federal Officers)

6. On or about June 17, 2015, within the Eastern District of New York, the defendant FAREED MUMUNI did knowingly and intentionally attempt to kill one or more officers and employees of an agency of the United States Government and one or more persons assisting such officers and employees, to wit: Special Agents and Task Force Officers of the Federal Bureau of Investigation, while such officers and employees were engaged in and on account of the performance of official duties.

(Title 18, United States Code, Sections 1114(3) and 3551 et seq.)

COUNT SIX
(Assault of a Federal Officer)

7. On or about June 17, 2015, within the Eastern District of New York, the defendant FAREED MUMUNI did knowingly and intentionally forcibly assault, resist, oppose, impede, intimidate and interfere with a person designated in Section 1114 of Title 18 of the United States Code, to wit: a Special Agent of the Federal Bureau of Investigation, while such officer and employee was engaged in and on account of the performance of official duties, and such act involved the use of a dangerous and deadly weapon.

(Title 18, United States Code, Sections 111(a)(1), 111(b) and 3551 et seq.)

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE, TWO AND FIVE**

8. The United States hereby gives notice to the defendants charged in Counts One, Two and Five that, upon their conviction of any such offenses, the government will seek forfeiture in accordance with (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any property, real or personal, constituting or derived from proceeds traceable to such offenses, and/or (b) Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c), which require the forfeiture of all assets, foreign or domestic: (i) of any individual, entity, or organization engaged in planning or perpetrating any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property, and all assets, foreign or domestic, affording any person a source of influence over any such entity or organization; (ii) acquired or maintained by any person with the intent and for the purpose of supporting, planning, conducting, or concealing any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property; (iii) derived from, involved in, or used or intended to be used to commit any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property; or (iv) of any individual, entity or organization engaged in planning or perpetrating any act of international terrorism against any international organization or against any foreign Government.

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

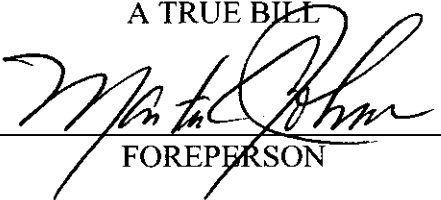
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

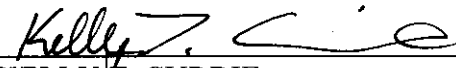
divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(C) and (G); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON


KELLY T. CURRIE
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2015R00096
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

MUNTHER OMAR SALEH and FAREED MUMUNI,

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 111(a)(1), 111(b), 371,
1114(3), 2339B(a)(1), 2 and 3551 et seq.)

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Douglas M. Pravda, Assistant U.S. Attorney (718) 254-6268